

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

PALISADES ESTATES EOM, LLC, NEWBURGH EOM LLC d/b/a CROSSROADS HOTEL, RATAN NEWBURGH LLC d/b/a RAMADA by WYNDHAM, SOUTH ROAD HOSPITALITY, LLC, HUDSON CONFERENCE CENTER, LLC, ROUTE 9 HOTEL LLC, SAI RAM MANAGEMENT LLC, SANDIP PATEL, RAPID RELIABLE TESTING NY LLC, AIMS NEWBURGH MANAGEMENT LLC, AIMS ORANGEBURGH MANAGEMENT LLC, CWP SYRACUSE I LLC, and ES ALBANY LLC,

Plaintiffs,  
v.

COUNTY OF ROCKLAND, et al.,

Defendants.

Case No. 7:23-cv-04215

**SUPPLEMENTAL  
AFFIDAVIT OF  
ASAF FLIGELMAN  
IN SUPPORT OF  
MOTION FOR A  
PRELIMINARY  
INJUNCTION**

STATE OF FLORIDA )  
                      )  
                      ss.:  
COUNTY OF BROWARD )

ASAF FLIGELMAN, being duly sworn, deposes and says:

1. I am a member of CWP Syracuse I LLC (“CWP Syracuse”), the owner of the Candlewood Suites Syracuse Airport (the “Candlewood Suites”), located in Salina, New York (Onondaga County). I have personal knowledge of the facts and circumstances set forth herein and submit this affidavit in support of Plaintiffs’ motion for a preliminary injunction.

2. Hotel staff informs me that, over the past week, there have been at least three instances where Onondaga County law enforcement entered the Candlewood Suites without a warrant to search the property.

3. First, on August 3, 2023, I understand three law enforcement vehicles and six police officers entered the Candlewood Suites. When Hotel staff asked whether the officers had a warrant, the officers said they did not and that they were in the hotel to inspect a guest room allegedly

housing a witness in an ongoing prosecution. The officer, without permission, entered the property and the witness's room.

4. I am informed this individual was checked into the hotel under a false name and checked out the following day. It is unclear whether this individual was placed in the hotel by Onondaga County as part of its ongoing efforts against the Candlewood Suites..

5. Second, on August 5, 2023, I am informed multiple police officers were loitering in the parking lot of the Candlewood Suites. Hotel staff approached the officers, identified themselves as hotel employees, and inquired as to whether there were any issues or if anyone had made a 9-1-1 call. The officers told them there were no issues reported or emergency calls made, and did not indicate why they were on the property.

6. Later that day, the officers entered and walked through the property – again without a warrant and without producing any identification.

7. Third, on August 7, 2023, I am told multiple police officers again entered and walked through the property without a warrant and without producing any identification.

8. At no point in time did I, nor any other employee at the Candlewood Suites, grant permission for any of these officers to enter or search the property.

WHEREFORE, it is respectfully requested that the Court grant the motion in its entirety, along with such other and further relief as is just and proper. *[Signature]*

ASAE FLIGELMAN

## UNIFORM, ALL PURPOSE CERTIFICATE OF ACKNOWLEDGEMENT

STATE OF FLORIDA )  
 ) ss.:  
COUNTY OF BROWARD )

On the 19 day of AUGUST, 2023, before me, the undersigned, personally appeared ASAF FLIGELMAN, personally known to me or proved to me on the basis of satisfactory evidence to be the individual whose name is subscribed to the within instrument and acknowledged to me that he/she executed the same in his/her capacity, and that by his/her signature on the instrument, the individual, or the person upon behalf of which the individual acted, executed the instrument.

NEW YORK DR  
#297 283-663

Mr. Fagel

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**NOTARY PUBLIC**



Maria Rosell  
Comm.: HH 349930  
Expires: February 4, 2027  
Notary Public - State of Florida